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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

CHRISTINE RIGANIAN and DONNA  
SPURGEON, *on behalf of themselves and  
all others similarly situated,*

Plaintiffs,

v.

LIVERAMP HOLDINGS INC. and  
LIVERAMP INC., *corporations organized  
under the laws of the State of Delaware,*

Defendants.

Case No. 4:25-cv-824 (JST)

**JOINT STIPULATION RE ESI  
PROTOCOL AND PROTECTIVE  
ORDER SCHEDULE**

1 Pursuant to Civil L.R. 6-1(a), Plaintiffs Christine Riganian and Donna Spurgeon  
2 (“Plaintiffs”), and Defendants LiveRamp Holdings, Inc. and LiveRamp Inc. (“LiveRamp”), by and  
3 through their attorneys of record, stipulate as follows:

4 WHEREAS, the parties’ Joint Case Management Statement proposed a deadline of  
5 Monday, April 28, 2025, for the parties to file their proposed Protective Order and Stipulated ESI  
6 Protocol (ECF 35 at 18);

7  
8 WHEREAS, Plaintiffs provided LiveRamp with drafts of the proposed Protective Order and  
9 Stipulated ESI Protocol on March 28, 2025, and LiveRamp provided revisions to those drafts on  
10 April 23, 24, and 25, 2025, and the parties met and conferred regarding these drafts on April 3,  
11 2025, and April 24, 2025;

12  
13 WHEREAS, the parties continue to actively meet and confer on various topics addressed in  
14 those documents, including the scope and mechanics of ESI preservation and proposed Protective  
15 Order provisions;

16  
17 WHEREAS, certain issues related to ESI preservation and proposed Protective Order  
18 provisions require further discussion, and thus the parties request to continue to meet and confer in  
19 good faith in an attempt to either come to agreement on related terms set forth in those documents  
20 or narrow the scope of disputed issues for resolution by the Court;

21  
22 WHEREAS, Plaintiffs intend to request at the April 29, 2025 Initial Case Management  
23 Conference before the Honorable Judge Tigar that the Court set a date certain by which the parties  
24 either submit a joint stipulated ESI Protocol and Protective Order or briefing addressing disputed  
25 issues;

26  
27 WHEREAS, the parties’ stipulation herein will not alter the date of any event or any  
28 deadline already fixed by Court order;

1 NOW, THEREFORE, the parties stipulate and agree that submission of the ESI Protocol  
2 and Protective Order will be deferred pending the Court's guidance on timing and process for  
3 submission.  
4

5  
6  
7 Dated: April 28, 2025

/s/ Michael W. Sobol

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*Attorneys for Plaintiffs and the Proposed Classes*

17  
18 Dated: April 28, 2025

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**ATTESTATION**

I, Michael W. Sobol, am the ECF User whose ID and password are being used to file this  
**JOINT STIPULATION RE ESI PROTOCOL AND PROTECTIVE ORDER SCHEDULE.**  
Pursuant to Civil Local Rule 5.1 regarding signatures, I attest that concurrence in the filing of this  
document has been obtained from the other signatories.

Dated: April 28, 2025

/s/ Michael W. Sobol  
Michael W. Sobol  
**LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP**